

DEPARTMENT OF LAW ENFORCEMENT IDAHO STATE POLICE DIVISION



FHWA- 98-3414-18

September 16, 1998

Docket Clerk US Department of Transportation Dockets Room PL-40 1 400 Seventh Street, SW Washington, District of Columbia 20590-000 1

Thank you for the opportunity to comment on FHWA Docket Number FHWA-98-3414, Out-of-Service Criteria. Following are comments from the Idaho State Police Division Commercial Vehicle Safety Program (ID CVS).

ID CVS prefers continued use of the out-of-service criteria (OOS criteria) as guides for enforcement. The Federal Motor Carrier Safety Regulations (FMCSRs) should refer to the OOS criteria but not include the specific criteria. Modifying regulations is too cumbersome and timeconsuming for the annual review and update process preferred for the OOS criteria.

The OOS criteria are an invaluable tool for the community of those who monitor safety on the highways. The OOS criteria should be broadly distributed and widely used as an effort to promote consistency and uniformity. FHWA should continue to strongly encourage all enforcement jurisdictions to utilize the criteria. Further, the criteria should be made available to the commercial vehicle industry so they know what to expect and can more readily comply with regulations.

If you have any questions, call me at (208) 884-7220.

Sincerely,

SAUNDRA K. DEKLOTZ

Commercial Vehicle Safety Program Manager

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